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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	CC Docket No. 95-116
Telephone Number Portability	)	DA 98-4491
Phase I Implementation	)	DA 98-451

REPLY COMMENTS OF SPRINT CORPORATION

On March 2, 1998, a number of carriers, including the Sprint Local Telephone Companies, requested a delay of the local number portability ("LNP") Phase I implementation deadline of March 31, 1998. The companies requesting waivers explained that they would not be able to meet the Commission's implementation deadline due to the failure of the number portability administration vendor to provide a stable platform capable of supporting LNP. While the vendor has been replaced, the time lost by the vendor's inability to meet its contractual obligations has caused the involved carriers to require a delay in the Phase I implementation date.

While the waiver requests were consistent regarding the cause for the delay, they were not consistent with respect to the date on which implementation would ultimately take place. For example, Sprint noted it would be prepared to deploy LNP in the Minneapolis MSA by July 13, 1998. However, in its waiver request, US WEST, the dominant ILEC in the MSA, asserted that it would be prepared to provide the service no sooner than July 17, 1998. Similar discrepancies in Phase I implementation dates are found throughout the waiver filings.

On March 12, 1998, AT&T filed comments on the various waiver requests. AT&T agreed that some delay would be necessary for LECs operating in regions affected by the vendor failure. Toward that end, AT&T suggested a schedule that provides

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specific deployment dates for Phases I, II and III.<sup>1</sup> Sprint agrees with AT&T that it would be prudent for the Commission to establish uniform implementation dates for each Phase affected by the vendor delay in providing the Number Portability Administration Center ("NPAC") and encourages the Commission to adopt such a schedule.

However, while Sprint strongly supports timely implementation of LNP, it does not support adoption of the timeline proffered by AT&T, which provides for a two week interval between inter-company testing and full LNP implementation. AT&T's two week formula is too simplistic and ignores the specific realities involved in each Phase implementation. The ability to complete implementation within two weeks of testing is dependent upon the number of central offices in which the service is to be deployed, the number of LECs involved and the specific manner in which the LECs are interconnected, among other considerations. In a situation where a LEC has only one or two central offices to cut-over, a two week time frame can likely be achieved. However, in most MSAs, there are multiple LECs most of whom will have multiple switches which, according to AT&T's schedule, would need to be tested and cut-over within fourteen calendar days. This, in Sprint's opinion, is a virtual impossibility.

The only rationale AT&T offers for its suggested two week interval is that once the NPAC testing has been completed, there is no reason to repeat testing in subsequent MSAs in the region.<sup>2</sup> AT&T is wrong. It is wrong to assume that, just because the NPAC interacts correctly with one switch in one MSA, it will respond exactly the same with every switch. It is true, as AT&T professes, that as each Phase is deployed, valuable information will have been gained that will make the testing process more efficient.<sup>3</sup> Efficiency does not, however, justify eliminating valid testing efforts, nor should it come at the expense of network reliability which is critical to the successful execution of LNP.

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<sup>1</sup> AT&T Comments at p.18.

<sup>2</sup> *Id.* at p. 17.

Consequently, Sprint urges the Commission to adopt a uniform implementation schedule for all Phases of LNP deployment; it should not, however, adopt AT&T's proposed schedule. The Commission must instead craft a schedule which provides for the dominant LEC in the MSA to participate in the initial testing and acceptance of the NPAC system and to implement LNP either prior to or concurrent with all non-dominant LECs in the MSA. The schedule should provide for LNP deployment as soon as possible following reasonable inter-company testing.

MCI also filed comments on March 12, 1998, responding specifically to the waiver requests made by Sprint and AT&T. MCI does not disagree with the need for additional time to deploy LNP in the Minneapolis MSA; it does, however, disagree with the implementation schedules proffered by Sprint and AT&T. First, MCI contends that May 11<sup>th</sup>, date used by both companies as the stake date on which the NPAC will be available, is a "very conservative estimate" and is not an "agreed upon" date.<sup>4</sup> Sprint notes that it was Lockheed/Martin, the NPAC vendor, who provided the May 11<sup>th</sup> ready date to the industry; Sprint did not on its own choose that date for purposes of its waiver filing.

Second, MCI suggests that Sprint can deploy LNP much sooner than the date provided in its waiver request. Sprint is puzzled by this claim for a number of reasons. First, MCI has provided no facts to support its challenge of Sprint's deployment time frame. Second, MCI seems to ignore the fact that the implementation schedule provided by Sprint was among the most aggressive in the industry. In sum, MCI's comments have no basis in fact; they should be dismissed by the Commission.

For the reasons set out here and in its waiver request, Sprint asks for a limited waiver of the Phase I implementation date to provide it additional time to implement

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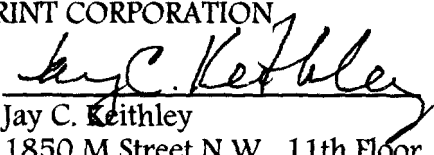
<sup>3</sup> *Id.* at p. 15.

<sup>4</sup> MCI Comments at p. 2.

LNP in those MSAs impacted by failure of the initial LNP data base. Sprint urges the Commission to provide for the speedy implementation of LNP using an implementation schedule founded on initial compliance by the dominant LEC in the MSA and providing for reasonable testing by all impacted carriers.

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March 17, 1998

## **CERTIFICATE OF SERVICE**

I, Melinda L. Mills, hereby certify that I have on this 17<sup>th</sup> day of March 1998, served via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Reply Comments of Sprint Corporation" in the Matter of Telephone Number Portability Phase I Implementation, CC Docket No. 95-116, filed this date with the Secretary, Federal Communications Commission, to the persons on the attached service list.

  
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